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9 Attorneys for Secured Creditors,
10 U.S. Bank Trust National Association as Trustee of the Lodge Series III Trust,
11 U.S. Bank Trust National Association as Trustee of the Chalet Series III Trust,
12 U.S. Bank Trust National Association as Trustee of the Bungalow Series IV Trust, and
13 U.S. Bank Trust National Association as Trustee of the Bungalow Series F Trust

14 UNITED STATES BANKRUPTCY COURT
15
16 DISTRICT OF NEVADA – LAS VEGAS DIVISION

17 In Re:

18 MELANIE SCHULTE and
19 WILLIAM SCHULTE,

20 2704 SATTLEY LLC,
21 HOT ENDEAVOR LLC,
22 1341 MINUET LLC,
23 1708 PLATO PICO LLC,
24 2228 WARM WALNUT LLC,
25 9425 VALLEY HILLS LLC,
26 9500 ASPEN GLOW LLC,
27 5218 MISTY MORNING LLC,
28 CHERISH LLC,
SABRECO INC.,
KEEP SAFE LLC,

Debtors.

Case No.: 09-29123-mkn

Chapter 11

Jointly Administered with:

09-27238-BAM
09-27909-BAM
09-27910-BAM
09-27911-BAM
09-27912-BAM
09-27913-BAM
09-27914-BAM
09-27916-BAM
09-28513-BAM
09-31584-BAM
09-31585-BAM

**DECLARATION OF SN SERVICING
CORPORATION IN SUPPORT OF
MOTION TO CLARIFY PLAN
TREATMENT REGARDING VARIOUS
REAL PROPERTIES**

1 I Jody Lee being duly sworn, depose and say:

2 1. I am employed by SN Servicing Corporation (“Servicer”) and am authorized to
3 sign this declaration on behalf of Servicer, which services the loans at issue in the Motion to
4 Clarify Plan Treatment Regarding Various Real Properties, filed concurrently herewith (the
5 “Motion”).

6 2. In the regular performance of my job functions, I am familiar with and have
7 access to the business records maintained by Servicer for the purpose of servicing mortgage
8 loans on behalf of various secured creditors. These records, which include data compilations,
9 electronically imaged documents, and other records, are made at or near the time or date by,
10 or from information provided by persons with knowledge of the activity and transactions
11 reflected in such records, and are kept in the course of business activity conducted regularly
12 by Servicer. It is the regular practice of Servicer’s mortgage servicing business to make
13 and/or maintain these records including the records of prior servicers of the loans now
14 serviced by Servicer, including the loans at issue in the Motion. Servicer relies upon the
15 accuracy of those records in conducting its business of servicing loans, including the loans at
16 issue in the Motion.

17 3. I regularly verify Servicer records, loan histories, correspondence, and
18 communication histories. This entails reviewing, becoming familiar with, and participating in
19 the review of documents related to loan accounts for loans serviced by Servicer. From my
20 employment for Servicer, I am familiar with its business operations and with the services that
21 Servicer offers to its customers.

22 4. I have personally reviewed Servicer’s records as they relate to the loans
23 referred to herein, and as to the following facts, I know them to be true of own knowledge or I
24 have gained knowledge of them from my review of Servicer’s business records. If called
25 upon to testify, I could and would competently testify to the following under oath.

26 5. On or about March 21, 1994, Debtors Melani Schulte and William R. Schulte
27 executed a Note and Deed of Trust in favor of Comstock Bank and pledged the real property
28 commonly known as 8216 Peaceful Canyon Drive, Las Vegas, NV 89134 as security for

1 Debtors' obligations under the Note and Deed of Trust. Proof of Claim No. 5, filed on
2 November 5, 2009, evidenced a total claim of \$86,994.02, with pre-petition arrears of
3 \$8,606.19, secured by that property (the "Peaceful Canyon Claim"). *See* Claim 5-1. The
4 maturity date of the loan was April 1, 2024. *Id.* The monthly payment due on the loan at the
5 time the Petition was filed was \$1,032.70, which consisted of \$762.76 for principal and
6 interest and \$269.94 for escrow. True and correct copies of the Note and Deed of Trust were
7 attached to the Peaceful Canyon Claim, which is currently held by U.S. Bank Trust National
8 Association as Trustee of the Lodge Series III Trust. *Id.*

9 6. On or about August 14, 2001, Debtor Melani Schulte executed a Note and
10 Deed of Trust in favor of Amera Corporation and pledged the real property commonly known
11 as 1624 Desert Canyon Court, Las Vegas, NV 89128 as security for her obligations under the
12 Note and Deed of Trust. Proof of Claim No. 37, filed on January 5, 2010, evidenced a total
13 claim of \$90,620.12, with pre-petition arrears of \$12,943.01, secured by the real property
14 commonly known as 1624 Desert Canyon Court, Las Vegas, NV 89128 (the "Desert Canyon
15 Claim"). *See* Claim 37-1. The maturity date of the loan was September 1, 2016. *Id.* The
16 monthly payment due on the loan at the time the Petition was filed was \$1,541.50, which
17 consisted of \$1,248.60 for principal and interest and \$292.90 for escrow. True and correct
18 copies of the Note and Deed of Trust were attached to the Desert Canyon Claim, which is
19 currently held by U.S. Bank Trust National Association as Trustee of the Lodge Series III
20 Trust. *Id.*

21 7. On or about November 17, 2000, Debtor Melani Schulte executed a Note and
22 Deed of Trust in favor of Amera Mortgage Corporation and pledged the real property
23 commonly known as 1194 Stormy Valley Road, Las Vegas, NV 89123 as security for her
24 obligations under the Note and Deed of Trust. Proof of Claim No. 39, filed on January 7,
25 2010, evidenced a total claim of \$113,403.16, with pre-petition arrears of \$9,738.59, secured
26 by the real property commonly known as 1194 Stormy Valley Road, Las Vegas, NV 89123
27 (the "Stormy Valley Claim"). *See* Claim 39-1. The maturity date of the loan was December
28 1, 2030. *Id.* The monthly payment due on the loan at the time the Petition was filed was

1 \$1,052.33, which consisted of \$857.03 for principal and interest and \$195.30 for escrow.
2 True and correct copies of the Note and Deed of Trust were attached to the Stormy Valley
3 Claim, which is currently held by U.S. Bank Trust National Association as Trustee of the
4 Chalet Series III Trust. *Id.*

5 8. On or about December 6, 2000, Debtor Melani Schulte executed a Note and
6 Deed of Trust in favor of Amera Mortgage Corporation and pledged the real property
7 commonly known as 922 Saddle Horn Drive, Henderson, NV 89015 as security for her
8 obligations under the Note and Deed of Trust. Proof of Claim No. 40, filed on January 7,
9 2010, evidenced a total claim of \$101,557.56, with pre-petition arrears of \$7,965.21, secured
10 by the real property commonly known as 922 Saddle Horn Drive, Henderson, NV 89015 (the
11 “Saddle Horn Claim”). *See* Claim 40-1. The maturity date of the loan was December 1,
12 2030. *Id.* The monthly payment due on the loan at the time the Petition was filed was
13 \$940.66, which consisted of \$759.87 for principal and interest and \$180.79 for escrow. True
14 and correct copies of the Note and Deed of Trust were attached to the Saddle Horn Claim,
15 which is currently held by U.S. Bank Trust National Association as Trustee of the Bungalow
16 Series F Trust. *Id.*

17 9. On or about June 11, 2001, Debtor Melani Schulte executed a Note and Deed
18 of Trust in favor of Amera Mortgage Corporation and pledged the real property commonly
19 known as 4521 W. La Madre Way, North Las Vegas, NV 89031 as security for her
20 obligations under the Note and Deed of Trust. Proof of Claim No. 41, filed on January 7,
21 2010, evidenced a total claim of \$78,029.90, with pre-petition arrears of \$10,691.27, secured
22 by the real property commonly known as 4521 W. La Madre Way, North Las Vegas, NV
23 89031 (the “La Madre Claim”). *See* Claim 41-1. The maturity date of the loan was July 1,
24 2016. *Id.* The monthly payment due on the loan at the time the Petition was filed was
25 \$1,256.92, which consisted of \$1,049.83 for principal and interest and \$207.09 for escrow.
26 True and correct copies of the Note and Deed of Trust were attached to the La Madre Claim,
27 which is currently held by U.S. Bank Trust National Association as Trustee of the Lodge
28 Series III Trust. *Id.*

1 10. On or about December 10, 2001, Debtor Melani Schulte executed a Note and
2 Deed of Trust in favor of Amera Mortgage Corporation and pledged the real property
3 commonly known as 2525 Via Di Autostrada, Henderson, NV 89074 as security for her
4 obligations under the Note and Deed of Trust. Proof of Claim No. 42, filed on January 7,
5 2010, evidenced a total claim of \$89,351.45, with pre-petition arrears of \$11,923.89, secured
6 by the real property commonly known as 2525 Via Di Autostrada, Henderson, NV 89074 (the
7 “Autostrada Claim”). See Claim 42-1. The maturity date of the loan was January 1, 2017. *Id.*
8 The monthly payment due on the loan at the time the Petition was filed was \$1,419.15, which
9 consisted of \$1,133.55 for principal and interest and \$285.60 for escrow. True and correct
10 copies of the Note and Deed of Trust were attached to the Autostrada Claim, which is
11 currently held by U.S. Bank Trust National Association as Trustee of the Chalet Series III
12 Trust. *Id.*

13 11. On or about December 15, 2004, Debtor Melani Schulte executed a Note and
14 Deed of Trust in favor of countrywide Home Loans, Inc. and pledged the real property
15 commonly known as 3322 Cheltenham Street, Las Vegas, NV 89129 as security for her
16 obligations under the Note and Deed of Trust. Proof of Claim No. 45, filed on January 13,
17 2010, evidenced a total claim of \$219,743.14, with pre-petition arrears of \$13,684.22, secured
18 by the real property commonly known as 3322 Cheltenham Street, Las Vegas, NV 89129 (the
19 “Cheltenham Claim”). See Claim 45-1. The maturity date of the loan was January 1, 2035.
20 *Id.* The monthly payment due on the loan at the time the Petition was filed was \$1,693.22,
21 which consisted of \$1,478.80 for principal and interest and \$214.42 for escrow. True and
22 correct copies of the Note and Deed of Trust were attached to the Cheltenham Claim, which is
23 currently held by U.S. Bank Trust National Association as Trustee of the Bungalow Series IV
24 Trust. *Id.*

25 12. On or about August 25, 1998, Debtors Melani Schulte and William R. Schulte
26 executed a Note and Deed of Trust in favor of First Nationwide Mortgage Corporation dba
27 Cal Fed Lending and pledged the real property commonly known as 5609 San Ardo Place,
28 Las Vegas, NV 89130 as security for Debtors’ obligations under the Note and Deed of Trust.

1 Proof of Claim No. 58, filed on February 5, 2010, evidenced a total claim of \$100,709.15,
2 with pre-petition arrears of \$8,471.58, secured by the real property commonly known as 5609
3 San Ardo Place, Las Vegas, NV 89130 (the "San Ardo Claim"). See Claim 58-1. The
4 maturity date of the loan was September 1, 2028. *Id.* The monthly payment due on the loan
5 at the time the Petition was filed was \$984.74, which consisted of \$754.97 for principal and
6 interest and \$229.77 for escrow. True and correct copies of the Note and Deed of Trust were
7 attached to the San Ardo Claim, which is currently held by U.S. Bank Trust National
8 Association as Trustee of the Lodge Series III Trust. *Id.*

9 13. On or about February 7, 2002, Leola Brinker executed a Note and Deed of
10 Trust in favor of Amera Mortgage Corporation and pledged the real property commonly
11 known as 8562 Lambert Drive, Las Vegas, NV 89147 as security for her obligations under the
12 Note and Deed of Trust. True and correct copies of the Note and Deed of Trust are attached
13 hereto as **Exhibit "A-1"** and **Exhibit "A-2,"** respectively. The maturity date for the loan was
14 February 1, 2032. *Id.* No proof of claim was filed for the claim secured by the real property
15 common known as 8562 Lambert Drive, Las Vegas, NV 89147 (the "Lambert Claim"). The
16 monthly payment due on the loan at the time the Petition was filed was \$1,237.76, which
17 consisted of \$1,036.91 for principal and interest and \$200.85 for escrow. The Lambert Claim
18 is currently held by U.S. Bank Trust National Association as Trustee of the Bungalow Series
19 IV Trust.

20 I declare under penalty of perjury under the laws of the United States of America
21 that the foregoing is true and correct.

22 Executed on 5/20/2021 (Date) Eureka (City), CA (State)

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24 
25 Jody Lee
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